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**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

SOVEREIGN BUSINESS SOLUTIONS
LLC and L. STEVEN HAYNES,

Plaintiffs,

v.

PLAIN GREEN, LLC,

Defendant.

Case No.: 2:21-cv-00404-RFB-EJY

**STIPULATION AND ORDER TO
EXTEND DEADLINE TO RESPOND TO
COMPLAINT**

(FIRST REQUEST)

Plaintiffs Sovereign Business Solutions, LLC and L. Steven Haynes (“Plaintiffs”) and Defendant Plain Green, LLC (“Plain Green”) (collectively, the “Parties”), by and through their undersigned counsel, for good cause shown, hereby stipulate and agree to extend Plain Green’s deadline to respond to Plaintiffs’ complaint **from March 17, 2021, to April 1, 2021.**

WHEREAS:

1. Plaintiffs filed suit against Plain Green in the Eighth Judicial District Court of Clark County, Nevada on July 2, 2020. ECF No. 1-1

2. On March 10, 2021, Plain Green filed a Notice of Removed Action in the Eighth Judicial District Court and a Petition for Removal in this Court. ECF No. 1.

3. Federal Rule of Civil Procedure 81(c)(2)(C) requires that a defendant that has not answered or otherwise opposed a complaint must answer or present other defenses within 7 days after the notice of removal is filed.

4. Plain Green's answer or motion is therefore currently due on March 17, 2021.

5. The Parties previously stipulated to an extension in state court.

6. Plain Green needs additional time to adequately investigate and prepare its response to Plaintiffs' complaint.

7. This extension request is sought in good faith and is not made for the purpose of delay.

8. This is the first request before this Court for a stipulation to extend Plain Green's deadline to respond to Plaintiffs' complaint.

9. Nothing herein shall be construed as a waiver or limit on Plaintiffs' ability to seek remand.

THEREFORE, the Parties respectfully request an extension for Plain Green to file its answer or motion from March 17, 2021, to, and including, April 1, 2021.

Dated: March 16, 2021

Dated: March 16, 2021

ARMSTRONG TEASDALE LLP

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By: /s/ Brandon P. Johansson

By: /s/ Kelly H. Dove

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ORDER

IT IS ORDERED that, pursuant to a stipulation between the Parties and good cause appearing, the deadline for Defendant Plain Green to answer or otherwise oppose the complaint [ECF No. 1-1] is extended from March 17, 2021, to, and including, April 1, 2021.

IT IS SO ORDERED.

DATED: this 16th day of March, 2021.


ELAYNA J. YOUCHAR
UNITED STATES MAGISTRATE JUDGE

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